

REMARKS

The outstanding issues in the instant application are as follows:

- Claims 1-26 are rejected under 35 U.S.C. §103(a).

Applicant hereby traverses the outstanding objections and rejections, and requests reconsideration and withdrawal in light of the remarks contained herein. Claims 1-26 are pending in this application.

I. REJECTIONS UNDER 35 U.S.C. § 103(a)

Claims 1-26 are rejected as being unpatentable over U.S. Patent No. 6,061,697 to Nakao (hereinafter *Nakao*) in view of U.S. Publication No. 2004/0177321 to Brown et al., (hereinafter *Brown*).

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. *See* M.P.E.P. § 2143. Applicant asserts that the rejections do not satisfy these criteria.

A. Claims 1-7

Claim 1 requires, in pertinent part, “identifying a plurality of tags responsive to said parsing; [and] inserting one or more restriction tags into said revised document delimiting non-editable content defined by one or more of said plurality of tags.” The Examiner contends that *Nakao* teaches “identifying a plurality of editable tags in the document.” Office Action, p. 2. However, as noted above, claim 1 requires “identifying a plurality of tags” and not identifying a plurality of *editable* tags, as noted by the Examiner. Claim 1 does define that one or more of the plurality of tags defines non-editable content, but this definition of non-editable content is not the same as identifying a plurality of editable tags, as recited by the Examiner.

Moreover, *Nakao* does not even teach identifying a plurality of tags, whether editable tags or not. The Examiner cites to Column 9, lines 1-45, as teaching identifying a plurality of *editable* tags. However, Column 9, lines 1-45, of *Nakao* discusses document element information that is part of the fundamental structure of data according to the *Nakao* invention. Col. 8, lns 56-58. *Nakao* describes that part of this information, which is SGML information, includes SGML tags. Col. 9, lns 7-8. Nothing in *Nakao* teaches or suggests that the *Nakao* invention identifies a plurality of these tags. *Nakao* merely provides that these tags exist. *Nakao* also teaches element IDs used as an ID attribute for SGML hypertext linking; revision numbers that track the particular version of the element; and links that represent the local document structure which are used to create an extended content model and to calculate the restriction of a partial editing. Col. 9, lns 1-45. Nothing in this disclosure teaches or even suggests identifying a plurality of tags, as required by claim 1.

As noted above, claim 1 requires, “inserting one or more restriction tags into said revised document delimiting non-editable content defined by one or more of said plurality of tags.” The Examiner contends that *Nakao* teaches “inserting restriction tags into a DTD for the revised document delimiting non-editable content defined by the tags.” Office Action, p. 3. As is well-known in the art, a DTD (Document Type Definition) defines the structure of a document encoded in SGML, or any of its derivative tag-based languages. *Nakao* describes SGML statements in a DTD that define non-editable portions of the resulting document structure. Col. 12, ln 48 – Col. 13, ln 28; Figs. 9A, 9B, and 9C. *Nakao* does not teach or even suggest that restriction tags are inserted into the revised document, as required by claim 1.

Even though the Examiner states that *Nakao* teaches “inserting one or more restriction tags,” he then admits that *Nakao* does not, in fact, explicitly teach this limitation. The Examiner, instead, offers *Brown* to cure this deficiency. The Examiner contends that *Brown* “teaches a method of inserting restriction tags into the editable, i.e., revised, document.” Office Action, p. 3. *Brown* does, in fact, teach inserting restriction tags into a document, but it does not teach inserting restriction tags into a “revised document,” as required in claim 1. *Brown* begins with a DTD for a particular application. Page 2, para. [0026]. After determining the allowable syntax by examining the DTD, a first user is presented with

selectable editing restrictions to be applied to a particular document. Page 2, para. [0026]. This particular document is not generated based on the DTD, as would be required by claim 1. Therefore, *Brown* does not teach inserting restriction tags into a revised document.

Claim 1 also requires, “restricting edit functions of a page editor responsive to said page editor reading said one or more restrictive tags.” The Examiner alleges that claim 14 of *Nakao* teaches this restriction. However, in pertinent part, *Nakao* claim 14 provides, “editing consistency examining means for determining whether or not an edited result of said editing means is consistent with the entire document corresponding to the partial editing restriction information.” This claim limitation does not describe restricting edit functions of a page editor, but merely an editing consistency examining means for determining whether the edited document is consistent with the entire document corresponding to the partial editing restriction. As further described in Column 30 of *Nakao*, which provides the structure and definition of the means from claim 14, this editing consistency examining means provides for using the partial editing DTD to parse through a part of a document independently in order to check the edited part to ensure that it is consistent with the document DTD. Col. 30, lns 35-56. There is no description in *Nakao* that teaches or even suggests restricting edit functions of a page editor, as required by claim 1.

As noted above, neither *Nakao*, by itself, nor the combination of *Nakao* with *Brown* teaches or suggests each and every limitation of claim 1.

Claims 2–7 each depend directly or indirectly from independent claim 1 and, thus, inherit each of the limitations of claim 1. As such, claims 2–7 are each patentable over the asserted combination of references. Applicants, thus, assert that claims 1–7 are patentable over the § 103(a) rejection of record and respectfully request the Examiner to withdraw same.

B. Claims 8-14

Claim 8 requires, in pertinent part, “code for analyzing said one or more descriptive labels; [and] code for inserting a prohibition label in said modified document around each instance of non-editable content as defined by said one or more descriptive labels.” As noted above, the Examiner contends that *Nakao* teaches “identifying a plurality of editable tags in

the document.” Office Action, p. 5. However, claim 8 requires “code for analyzing said one or more descriptive labels” and not identifying a plurality of *editable* tags or *editable* descriptive labels, as noted by the Examiner.

As previously stated, *Nakao* does not teach code for analyzing one or more descriptive labels, whether editable labels or not. *Nakao* discusses document element information that is part of the fundamental structure of data according to the *Nakao* invention. Col. 8, lns 56-58. This information includes SGML tags. Col. 9, lns 7-8. Nothing in *Nakao* teaches or suggests that the *Nakao* invention analyzes these descriptive labels, as required by claim 8. *Nakao* merely provides that these tags exist.

Claim 8 also requires, “code for inserting a prohibition label in said modified document around each instance of non-editable content as defined by said one or more descriptive labels.” The Examiner contends that *Nakao* teaches “inserting restriction tags into a DTD for the revised document delimiting non-editable content defined by the tags.” Office Action, p. 5. However, as noted above, *Nakao* does not teach or even suggest that prohibition labels are inserted into the modified document, as required by claim 8. Moreover, the DTD statements are not “around each instance of non-editable content,” as required by claim 8. Instead, the DTD statements are general instructions that are widely applicable to structured documents that comply with the particular DTD model.

The Examiner admits that *Nakao* does not, in fact, explicitly teach this limitation, but, instead, offers *Brown* to cure this deficiency. The Examiner contends that *Brown* “teaches a method of inserting restriction tags into the editable, i.e., revised, document.” Office Action, p. 6. As previously stated, *Brown* does, in fact, teach inserting restriction tags into a document, but it does not teach inserting restriction tags into a “revised document,” as required in claim 8. Therefore, *Brown* does not teach code for inserting a prohibition label in the modified document around each instance of non-editable content as defined by the descriptive labels.

Claim 8 also requires, “code for prohibiting edit functions of a document editor responsive to said prohibition labels.” The Examiner alleges that claim 14 of *Nakao* teaches this restriction. Office Action, p. 6. *Nakao* claim 14 provides, “editing consistency

examining means for determining whether or not an edited result of said editing means is consistent with the entire document corresponding to the partial editing restriction information.” As stated above, this claim limitation does not describe code for prohibiting edit functions of a document editor, but merely an editing consistency examining means for determining whether the edited document is consistent with the entire document corresponding to the partial editing restriction. As further described in Column 30 of *Nakao*, which provides the structure and definition of the means from claim 14, this editing consistency examining means provides for using the partial editing DTD to parse through a part of a document independently in order to check the edited part to ensure that it is consistent with the document DTD. Col. 30, lns 35-56. There is no description in *Nakao* that teaches or even suggests code for prohibiting edit functions of a document editor.

As noted above, neither *Nakao*, by itself, nor the combination of *Nakao* with *Brown* teaches or suggests each and every limitation of claim 8.

Claims 9-14 each depend directly or indirectly from independent claim 8 and, thus, inherit each of the limitations of claim 8. As such, claims 9-14 are each patentable over the asserted combination of references. Applicants, thus, assert that claims 8-14 are patentable over the § 103(a) rejection of record and respectfully request the Examiner to withdraw same.

C. Claims 15-21

Claim 15 requires, in pertinent part, “analyzing a plurality of markup tags within said Web document; [and] inserting one or more restriction markup tags in said substitute Web document demarcating non-editable content as defined by one or more of said plurality of markup tags.” As noted above, the Examiner contends that *Nakao* teaches “identifying a plurality of editable tags in the document.” Office Action, p. 7. However, claim 15 requires “analyzing a plurality of markup tags within said Web document” and not identifying a plurality of *editable* tags, as noted by the Examiner.

As previously stated, *Nakao* does not teach analyzing a plurality of markup tags, whether editable tags or not. *Nakao* discusses document element information that is part of the fundamental structure of data according to the *Nakao* invention. Col. 8, lns 56-58. This

information includes SGML tags. Col. 9, lns 7-8. Nothing in *Nakao* teaches or suggests that the *Nakao* invention analyzing a plurality of markup tags, as required by claim 15. *Nakao* merely provides that these tags exist.

Claim 15 also requires, “inserting one or more restriction markup tags in said substitute Web document demarcating non-editable content as defined by one or more of said plurality of markup tags.” The Examiner contends that *Nakao* teaches “inserting restriction tags into a DTD for the revised document delimiting non-editable content defined by the tags.” Office Action, p. 7. However, as noted above, *Nakao* does not teach or even suggest that prohibition labels are inserted into the modified document, as required by claim 15. Instead, the DTD statements are general instructions that are widely applicable to structured documents that comply with the particular DTD model.

The Examiner admits that *Nakao* does not, in fact, explicitly teach this limitation, but, instead, offers *Brown* to cure this deficiency. The Examiner contends that *Brown* “teaches a method of inserting restriction tags into the editable, i.e., revised, document.” Office Action, p. 7. As previously stated, *Brown* does, in fact, teach inserting restriction tags into a document, but it does not teach inserting restriction tags into a “substitute Web document,” as required in claim 15. Therefore, *Brown* does not teach inserting one or more restriction markup tags in a substitute Web document demarcating non-editable content as defined by one or more markup tags.

Claim 15 also requires, “restricting edit functions of a Web editor responsive to said one or more restriction markup tags.” The Examiner alleges that claim 14 of *Nakao* teaches this restriction. Office Action, p. 7. *Nakao* claim 14 provides, “editing consistency examining means for determining whether or not an edited result of said editing means is consistent with the entire document corresponding to the partial editing restriction information.” As stated above, this claim limitation does not describe restricting edit functions of a Web editor, but merely an editing consistency examining means for determining whether the edited document is consistent with the entire document corresponding to the partial editing restriction. As further described in Column 30 of *Nakao*, which provides the structure and definition of the means from claim 14, this editing consistency examining means provides for using the partial editing DTD to parse through a

part of a document independently in order to check the edited part to ensure that it is consistent with the document DTD. Col. 30, lns 35-56. There is no description in *Nakao* that teaches or even suggests restricting edit functions of a Web editor.

As noted above, neither *Nakao*, by itself, nor the combination of *Nakao* with *Brown* teaches or suggests each and every limitation of claim 15.

Claims 16-21 each depend directly or indirectly from independent claim 15 and, thus, inherit each of the limitations of claim 15. As such, claims 16-21 are each patentable over the asserted combination of references. Applicants, thus, assert that claims 15-21 are patentable over the § 103(a) rejection of record and respectfully request the Examiner to withdraw same.

D. Claims 22-26

Claim 22 requires, in pertinent part, “a parsing engine for analyzing a plurality of Web page markup tags; [and] a list of restriction tags for insertion around said design elements, as defined by one or more of said plurality of Web page markup tags.” As noted above, the Examiner contends that *Nakao* teaches “identifying a plurality of editable tags in the document.” Office Action, p. 8. However, claim 22 requires “a parsing engine for analyzing a plurality of Web page markup tags” and not identifying a plurality of *editable* tags, as noted by the Examiner.

As previously stated, *Nakao* discusses document element information that is part of the fundamental structure of data according to the *Nakao* invention. Col. 8, lns 56-58. This information includes SGML tags. Col. 9, lns 7-8. However, nothing in *Nakao* teaches or suggests that the *Nakao* invention includes a parsing engine that analyzes a plurality of Web page markup tags, as required by claim 22. *Nakao* merely provides that these tags exist.

Claim 22 also requires, “a list of restriction tags for insertion around said design elements, as defined by one or more of said plurality of Web page markup tags.” The Examiner contends that *Nakao* teaches “inserting restriction tags into a DTD for the revised document delimiting non-editable content defined by the tags.” Office Action, p. 8. However, as noted above, *Nakao* does not teach or even suggest that restriction tags are

inserted into the design elements, as required by claim 22, but instead, that only SGML statements define what is and is not editable in documents that follow the particular DTD. Moreover, the DTD statements of *Nakao* are not “around each instance of non-editable content,” as required by claim 8. Instead, the DTD statements are general instructions that are widely applicable to structured documents that comply with the particular DTD model.

The Examiner admits that *Nakao* “does not explicitly teach a page editor comprising a plurality of deselectable editing functions, where deselection is responsive to restriction tags,” but offers *Brown* to cure this deficiency. Office Action, p. 9. The Examiner alleges that *Brown* “teaches a web development environment and page editor with deselectable editing functions responsive to the restriction tags.” Office Action, p. 9. Paragraphs [0072] and [0080] of *Brown*, which the Examiner cites as supporting his assertion, teaches that *Brown* displays an interface to a first user for selecting certain document elements for editing restrictions and then inserting tags into the resulting document based on the user’s selections. *Brown*, paras. [0072] & [0080]. However, this disclosure does not teach or even suggest that the deselection is responsive to the restriction tags, as required by claim 22. Instead, *Brown* is very clear that it is the user’s selection that triggers the insertion of the restriction tags. Therefore, *Brown* does not cure the admitted deficiency of *Nakao*, and, thus, the combination does not teach this limitation.

As noted above, neither *Nakao*, by itself, nor the combination of *Nakao* with *Brown* teaches or suggests each and every limitation of claim 22.

Claims 23-26 each depend directly or indirectly from independent claim 22 and, thus, inherit each of the limitations of claim 22. As such, claims 23-26 are each patentable over the asserted combination of references. Applicants, thus, assert that claims 22-26 are patentable over the § 103(a) rejection of record and respectfully request the Examiner to withdraw same.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 06-2380, under Order No. 47583/P041US/10311286 from which the undersigned is authorized to draw.

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Respectfully submitted,

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